

# TECHNICAL ANALYSIS

## Utah Coal Regulatory Program

---

April 5, 2004

TO: Internal File

THRU: Dana Dean, P.E., Team Lead, Environmental Scientist, Hydrology.

FROM: Jerriann Ernsten, Ph.D., Environmental Scientist, Biology.

RE: Refuse Pile and PMLU, Plateau Mining Co., Willow Creek Mine, C/007/0038,  
Task ID #1875

### **SUMMARY:**

On March 19, 2004, the Division received the second round of the amendment that addresses the refuse pile and post mine land use change at the Willow Creek Mine. This memo describes changes to the final seed mix for the reclamation project.

---

TECHNICAL MEMO

---

**TECHNICAL ANALYSIS:**

## RECLAMATION PLAN

### GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

#### **Analysis:**

The Permittee made the following adjustments to the upland seed mix (Table 5.3-2): (personal communications December 1<sup>st</sup>, 8<sup>th</sup> 2003 and January 8<sup>th</sup> 2004):

- Added two shrub species: Mountain Big Sage and Utah Serviceberry
- Removed two non-native species: Intermediate Wheatgrass and Yellow Sweetclover
- Replaced one forb species: Blueleaf Aster with Showy Goldeneye
- Changed the pounds per acre for a few of the species.

The Permittee provided an additional table showing the changed seed mix (Table 5.3-2b). The Permittee mentioned that the change in seed mix related to availability. Although availability may have been the driving force, the Division's phone log (December 1, 2003) indicates that the Permittee requested the change because of the desire to remove introduced species and to add more shrubs to the mix. Because the change was driven by more than just availability, the Division requested a new table in the MRP rather than just submitting the change in an "as-built".

The Division recommends retaining Table 5.3-2 in case the Permittee used the out-dated mix for previous projects.

#### **Findings:**

The Division considers information in the application adequate to meet the minimum General Requirements section of the Reclamation Plan regulations.

**RECOMMENDATIONS:**

Approve the amendment.

O:\007038.WIL\FINAL\jae1875.doc